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Target Corporation*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Indiezone, Inc., a Delaware corporation, and
EoBuy, Limited an Irish private limited
company,

Plaintiffs,

v.

Todd Rooke, Joe Rogness, Phil Hazel, Sam
Ashkar, Holly Oliver and U.S. Bank,
collectively the ***RICO Defendants***;

Jingit LLC., Jingit Holdings LLC., Jingit
Financial, Services LLC., Music.Me, LLC.,
Tony Abena, John E. Fleming, Dan
Frawley, Dave Moorehouse II, Chris
Ohlsen, Justin James, Shannon Davis, Chris
Karls in their capacities as officers, agents
and/or employees of the Jingit LLC.,
***Defendants in Negligence, and Aiding/
Abetting***;

Wal-Mart, General Electric, Target, DOE(s)
and ROE(s) 1 through 10, ***Defendants in
Negligence Secondary-Vicarious
Infringement***,

Defendants.

CASE NO. 4:13-cv-04280 (VC)

**DEFENDANT TARGET CORPORATION'S
OPPOSITION TO PLAINTIFF'S (1) SECOND
MOTION TO AMEND THEIR SUMMONS
AND COMPLAINT AND (2) MOTION
REQUESTING AN ENLARGEMENT OF
TIME TO SUBMIT A CORRECTED
RESPONSE AND/OR RENEW THEIR
RESPONSE TO THE DEFENDANTS'
MOTIONS TO COMPEL ARBITRATION,
DISMISS OR STAY THE PROCEEDINGS**

Honorable Vince Chhabria

Date: June 5, 2014
Time: 1:30 p.m.
Place: Courtroom 4, 17th Floor

Target Corporation hereby joins and incorporates by reference, as if fully set forth herein, the Memorandum in Opposition to Plaintiff's Second Motion to Amend Their Summons and Complaint, and the Memorandum in Opposition to Plaintiff's Motion Requesting An Enlargement of Time to Submit a Corrected Response and/or Renew their Response to the Defendants' Motions to Compel Arbitration, Dismiss or Stay the Proceedings, and the arguments and supporting affidavits made thereto, filed by defendants Jingit LLC, Jingit Holdings, LLC, Jingit Financial Services, LLC, Todd Rooke, Joe Rogness, Sam Ashkar, Phil Hazel, Holly Oliver, Shannon Davis, Justin James, Chris Ohlsen, Dan Frawley, Dave Moorehouse II, Tony Abena, Chris Karls, John E. Fleming, and Music.Me, LLC (ECF Nos. 94-95, 97), on the grounds that an amendment would be futile and an enlargement of time would be improper.

Dated: April 23, 2014

FAEGRE BAKER DANIELS LLP

By: /s/ Peter M. Routhier

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